

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR,

Plaintiff,

v.

Docket No.

CRAIG S. DONAIS, DONAIS LAW OFFICES, PLLC,
RUSSELL F. HILLIARD AND MARY K. DONAIS,

Defendants.

NOTICE OF REMOVAL

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441 and 1446, Defendants, Craig S. Donais, Donais Law Offices, PLLC and Mary K. Donais. (“Donais Defendants” or “Defendants”), hereby files this Notice of Removal, removing the above-captioned action from the Superior Court of the State of New Hampshire, Hillsborough County, Northern District, to the United States District Court for the District of New Hampshire. In support of this Notice of Removal, Donais Defendants state as follows:

1. This is a civil action for an alleged violation of 42 U.S.C. § 1981 in connection with a claim of racial harassment and retaliation, as well as claims of breach of fiduciary duty, breach of implied contract, breach of implied covenant of good faith and fair dealing, defamation, aiding and abetting defamation, invasion of privacy, a consumer protection act violation, abuse of judicial and administrative process, interference with contractual and advantageous relations, intentional infliction of emotional distress and civil conspiracy claims filed by Plaintiff in the Superior Court in and for Hillsborough County, Northern District, New Hampshire.

2. This action was filed on June 3, 2025.

3. This Notice of Removal is filed within thirty (30) days from the date on which the Removal Defendants “through service or otherwise” received a copy of the initial pleading, and is therefore timely under 28 U.S.C. §1446(b). Russell F. Hilliard, the only other named defendant, consents to removal.

4. Pursuant to 28 U.S.C. § 1446(a), the removing Defendants, Craig S. Donais, Donais Law Offices, PLLC and Mary K. Donais, have not formally been served with any process, pleadings and orders, but a copy of the Complaint is attached hereto as **Exhibit 1**. A copy of the state court docket is attached as **Exhibit 2**. As of the date of this removal, there are no pending motions.

5. Removal of this action is proper under 28 U.S.C. §§ 1441(a) and 1331 in that this is a civil action brought in a state court of which the district courts of the United States have original jurisdiction because Plaintiff asserts a claim for relief under 42 U.S.C. § 1981, an action that arises under the laws of the United States. *See* Exhibit 1, ¶¶ 651-688. Furthermore, this Court has supplemental jurisdiction over Plaintiff’s remaining claims pursuant to 28 U.S.C. § 1367, as these claims allege Plaintiff is entitled to damages stemming from the same events.

6. Accordingly, the jurisdiction of this action is governed by 28 U.S.C. § 1331, which holds that “the district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”

7. The United States District Court for the District of New Hampshire is the appropriate court to which the action must be removed because it is part of the “district and division within which such action is pending.” Plaintiff filed this action in the Superior Court in the State of New Hampshire, County of Hillsborough, Northern District. *See* 28 U.S.C. § 1446(a).

8. Undersigned counsel certifies, in accordance with 28 U.S.C. § 1446(d), that concurrent with the filing and service of this Notice of Removal, Defendants’ “Notice of Filing Notice of Removal” has been served upon all parties.

9. Undersigned counsel further certifies, in accordance with 28 U.S.C. § 1446(d), that concurrent with the filing and service of this Notice of Removal, a copy of same, along with Defendants’ “Notice of Filing Notice of Removal” has been filed with the Clerk of the Court of Hillsborough Superior Court, Northern District, Manchester, New Hampshire.

10. In accordance with Local Rule 81.1(c) of the United States District Court for the District of New Hampshire, within fourteen (14) days of the filing of the Notice of Removal, the Removal Defendants will file or cause to be filed with the Clerk of this Court certified or attested copies of the state court record.

11. Removing Defendants understand their obligation to file an answer or to present other defenses or objections available under Federal Rules of Civil Procedure within seven (7) days after the filing of this Notice of Removal, unless some later date applies. *See* Fed. R. Civ. P. 81(c)(2)(C).

12. By filing this Notice of Removal, Removing Defendants are not making a general appearance, and do not waive their right to raise any defense or grounds for dismissal pursuant to Fed. R. Civ. P. 12, or otherwise.

13. Removing Defendants have good and sufficient defenses to Plaintiff’s claims in this Civil Action.

14. Removing Defendants have not been served with any other pleadings, orders, or materials regarding this matter

WHEREFORE, Defendants pray that said action now pending in the Hillsborough Superior Court, Northern District be removed to the United States District Court for the District of New Hampshire.

Respectfully submitted,

Craig S. Donais, Donais Law Offices, PLLC,
and Mary K. Donais

MORRISON MAHONEY LLP

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following persons on this date in the manner specified herein:

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